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Bryan Estrada

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Ross Cornell, an individual, and Bryan Estrada, an individual;

Plaintiffs,

Office of the District Attorney, County
of Riverside, and Does 1-100,
inclusive:

Defendants.

Case No. 5:22-cv-00789 JWH (SHKx)
[Assigned to Hon. John W. Holcomb]

**DECLARATION OF BRYAN
ESTRADA IN SUPPORT OF
REPLY IN SUPPORT OF MOTION
FOR PRELIMINARY INJUNCTION**

**REDACTED VERSION OF
DOCUMENT TO BE FILED
UNDER SEAL**

[Filed concurrently with Reply,
*Declarations of Ross Cornell, Charles
Ballard, and David J. Darnell,
Objections to Defendant's Evidence,
and Response to Defendant's
Evidentiary Objections*]

Date: July 8, 2022
Time: 9:00 a.m.
Courtroom: 9D

Action Filed: May 9, 2022
Trial Date: None set

DECLARATION OF BRYAN ESTRADA

I, Bryan Estrada, hereby declare as follows:

1. I am an individual over the age of 18 and I attest to the matters set forth herein of my own personal knowledge. I make this declaration in support of Plaintiffs' Reply in Support of Motion for Preliminary Injunction and specifically to rebut the evidence presented in Defendant's Opposition. If called upon to do so, I could and would competently testify in accordance with the matters set forth herein.

8 2. I did not take photographs at every business location that I visited.
9 Rather, it was my practice to only take photographs in front of locations where I
10 noticed parking and related access barriers that affected me with respect to my
11 mobility disability and prevented full and equal access by me and other persons with
12 disabilities.

13 3. I visited the Corona Animal Hospital in Corona, California on June 26,
14 2020 and took a photograph in front of that location. I believe I took this
15 photograph in accordance with my general practice (*i.e.*, because I had encountered
16 parking and related access barriers at this location). I uploaded the photograph and
17 my location at the time to Ross Cornell through a mobile application that Mr.
18 Cornell developed and that I had downloaded on my phone. A true and correct copy
19 of the photograph I took in front of Corona Animal Hospital, along with data
20 showing my GPS location and the date and time, is attached hereto as **Exhibit 1**.

21 4. I visited Park Lanes Mobile Homes in Corona, California on June 26,
22 2020 and took a photograph in front of the facility's office. I believe I took this
23 photograph in accordance with my general practice (*i.e.*, because I had encountered
24 parking and related access barriers at this location). I uploaded the photograph and
25 my location at the time to Ross Cornell through the mobile application. A true and
26 correct copy of the photograph I took in front of the Park Lanes Mobile Homes
27 office, along with data showing my GPS location and the date and time, is attached
28 hereto as **Exhibit 2**.

1 5. I visited Ultra Imports Auto Parts in Riverside, California on June 26,
2 2020 and took a photograph in front of the store. I believe I took this photograph in
3 accordance with my general practice (*i.e.*, because I had encountered parking and
4 related access barriers at this location). I uploaded the photograph and my location
5 at the time to Ross Cornell through the mobile application. A true and correct copy
6 of the photograph I took in front of Ultra Imports Auto parts, along with data
7 showing my GPS location and the date and time, is attached hereto as **Exhibit 3**.

8 6. [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 7. [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]

22 8. On the morning of my arrest on March 10, I was taken from my
23 morning shower and made to sit outside in the cold in my wheelchair while officers
24 searched my home. As a result, [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]

28 ///

1 I hereby declare under penalty of perjury under the laws of the United States
2 that the foregoing is true and correct.

3 Executed on June 24, 2022 in Riverside, California.

4
5 DocuSigned by:
6 
7 280D42A2F4234F8...
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10 Bryan Estrada
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